

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT 75 Davis Street - 204 Cannon Building Providence, R. I. 02908

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REGION I WASTE MGMT. DIVISION

Mr. Merrill S. Hohman, Director Waste Management Division U.S. Environmental Protection Agency John F. Kennedy Federal Building Boston, MA 02203

Dear Mel:

As you may have heard, Ciba-Geigy of Cranston is planning on closing within the next year or two. That company has for quite some time caused significant environmental problems for the community, state and the federal government. In terms of hazardous waste and hazardous waste disposal, we are concerned that once the company leaves, problems with improper cleanup of chemicals that are not under the purview of hazardous waste storage or generator regulations may ensue.

In an attempt to deal with this problem, I would like to propose that EPA consider issuing a RCRA 3013 Order to Ciba-Geigy as an entire facility requiring them to thoroughly test to determine whether or not contamination of property beyond the scope of state regulatory coverage exists. Further, if there is a need for disposal of wastes, this order could mandate that requirement.

I would like to discuss this matter with you more fully. Please give it some consideration and get back to me.

Very truly yours,

Parry W. Moller, Chief

Division of/Air and Hazardous Materials

BWM: tg



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